

1 JONATHAN H. BLAVIN (State Bar No. 230269)

Jonathan.Blavin@mto.com

2 MUNGER, TOLLES & OLSON LLP

3 560 Mission Street, 27th Floor

San Francisco, CA 94105-2907

4 Telephone: (415) 512-4000

Facsimile: (415) 512-4077

5 ROSE L. EHLER (State Bar No. 296523)

Rose.Ehler@mto.com

6 LAURA M. LOPEZ (State Bar No. 313450)

Laura.Lopez@mto.com

7 MUNGER, TOLLES & OLSON LLP

8 350 South Grand Avenue, 50th Floor

9 Los Angeles, CA 90071-3426

Telephone: (213) 683-9100

10 Facsimile: (213) 687-3702

11 *Attorneys for SNAP INC.*

12
13 **UNITED STATES DISTRICT COURT**
14 **NORTHERN DISTRICT OF CALIFORNIA**

15
16 IN RE: SOCIAL MEDIA ADOLESCENT
17 ADDICTION/PERSONAL INJURY
PRODUCTS LIABILITY LITIGATION

MDL No. 3047

CASE NO.: 4:22-md-03047-YGR-PHK

Honorable Yvonne Gonzalez Rogers

18 This Document Relates to:

19 ALL ACTIONS

**DECLARATION OF LAURA M. LOPEZ
IN SUPPORT OF SNAP INC.'S OMNIBUS
MOTION TO SEAL (PLAINTIFFS'
OMNIBUS OPPOSITION BRIEF AND
NON-EXHIBIT MATERIALS)**

20
21
22
23 I, Laura M. Lopez, declare and state as follows:

24 1. I am an attorney with the law firm Munger, Tolles & Olson LLP and represent
25 Snap Inc. ("Snap") in the above-captioned case. I provide this declaration in support of Snap's
26 Omnibus Motion to Seal (Plaintiffs' Omnibus Opposition Brief and Non-Exhibit Materials). This
27
28

1 declaration is based on my personal knowledge. If called upon to do so, I could and would
2 competently testify as follows.

3 2. I have reviewed the exhibits listed below, each of which is a copy of the May 16,
4 2025 Expert Report of Dimitri Christakis. Based on my review and in consultation with Snap, I
5 understand there is good cause to redact the personal identifying information (“PII”) of non-parties
6 to this Litigation not employed by Snap, including names and user names of non-parties that
7 appear in the exhibits and which are detailed below. The PII of these non-parties is irrelevant to
8 the issues before the Court and redacting them is necessary to protect these individuals’ privacy.

Exhibits	Dkt. No.	Reason for Sealing
Exhibit 15 to the Declaration of Lexi J. Hazam in Support of Plaintiffs’ Response to Defendants’ Motion to Exclude General Causation Testimony of Plaintiffs’ Experts	2405-18	Non-employee names and user names reflecting first and last names at page 97; Non-employee name at page 147
Exhibit 1 to the Declaration of Melissa Yeates in Support of School District/Local Government Entity Plaintiffs’ Opposition to Defendants’ Motion to Exclude Testimony of School District Experts	2407-3	Non-employee names and user names reflecting first and last names at page 97; Non-employee name at page 147
Exhibit 16 to the Declaration of Lexi J. Hazam in Support of Plaintiff Harford County Board of Education Opposition to Defendants’ Motion for Summary Judgment	2400-18	Non-employee names and user names reflecting first and last names at page 97; Non-employee name at page 147

22 I declare under penalty of perjury under the laws of the State of California that the
23 foregoing is true and correct.

24 Executed on this 10th day of December, 2025, at Los Angeles, California.

26 /s/ Laura M. Lopez
27 Laura M. Lopez